

FILED 22 MAY '13 16:18 USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**UNDER SEAL**

UNITED STATES OF AMERICA

v.

JOHN WESLEY WALKER,  
IRINA WALKER, also known as  
Irina Kreuger,  
MARIO PEREZ, also known as  
El Cuba,  
DAVID SANCHEZ  
JOSE LUIS VIRGEN RAMIREZ,  
AURELIA GARCIA MENDOZA,  
APOLINAR MUNOZ GUTIERREZ,  
also known as Polo,  
CECILIO MENDOSA MAGANA,  
MAURO GONZALEZ PULIDO, also  
known as Cala,  
RUBEN SALTOS GODINA, also  
known as Chino,  
ARTURO OLMEDO SILVA, also  
known as El Havolin, Cepillo,  
EDUARDO CISNEROS, also known  
as Mariachi,  
EULALIO DELAMORA ANGUIANO,  
also known as Lalo,  
FRANCISCO JAVIER VEGA, also  
known as Sergio Gonzalez Manzano,  
OSCAR ACOSTA NAVARRETE,  
ANTONIO DOMINGUEZ ROBLES, also  
known as Tono, Memo,  
GERARDO GOMEZ CASTILLO, also  
known as Aguilo, and  
VALENTE PIEDRA MAGANA,

Defendants.

INDICTMENT

18 U.S.C. § 1955  
18 U.S.C. § 371  
7 U.S.C. § 2156(a)(1)  
18 U.S.C. § 2

UNDER SEAL

3:13-cr-00239-mo

**THE GRAND JURY CHARGES:**

**COUNT 1**  
**(Illegal Gambling Business)**

From about April 1, 2012, through about May 19, 2013, at Irrigon, Morrow County, in the District of Oregon, JOHN WESLEY WALKER, IRINA WALKER (also known as (aka) Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, and AURELIA GARCIA MENDOZA, defendants here, as principals and/or as aiders and abettors, did unlawfully, willfully and knowingly conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, said gambling business involving betting on cockfighting, in violation of the laws of the State of Oregon (OR. REV. STAT. §§ 167.122 and 167.127, as defined in OR. REV. STAT. § 167.117), which illegal gambling business involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of such business, and which illegal gambling business remained in substantially continuous operation for a period in excess of 30 days, and which illegal gambling business had a gross revenue of \$2,000.00 or more in any single day; all in violation of Title 18, United States Code, Sections 1955 and 2.

**COUNT 2**  
**(Conspiracy to Violate the Animal Welfare Act)**

**INTRODUCTION**

At all times relevant to this Indictment:

A. Cockfighting is a game or contest of chance in which a knife, a gaff or other sharp instrument is attached to the legs of gamecocks or roosters for the purpose of fighting each other. The fight occurs in a pit or ring surrounded by spectators. The fights between the roosters are supervised by a referee. The fight is ended when one rooster is dead or refuses to continue to

fight. If not killed during the fight, the losing rooster is almost always killed after the fight. A series of cockfights conducted in a day is referred to as a derby. A derby usually consists of dozens of individual cockfights lasting for several hours depending on the number of entries.

B. Participants in cockfighting include: (1) a promoter, who generally makes arrangements and oversees activities at the derby;(2) handlers or pitters, who prepare and handle birds during a fight and may be the actual owner of the bird or someone paid to do the job; (3) referees, who officiate in the pit during the cockfight; (4) spectators, who attend and watch the cockfights; and (5) concession workers, who sell food and drink.

C. In a derby a number of entrants or cockfighters pay a predetermined entry fee to enter a pre-set number of roosters, usually about five per cockfighter. The roosters are usually matched within a few ounces of each other for individual fights. The cockfighter whose roosters win the most fights in a derby wins the purse, which consists of all the entry fees of the derby participants, less approximately 10% kept by the "house" or promoter(s). In the event of a tie, the purse is split among the winners. Side bets also may occur between and among the cockfighters that do not involve the overall purse.

D. Aside from the gambling, the sponsor or promoter often derives profits from admission fees and concession sales, including the sale of alcoholic beverages. Individuals may profit from the sale or raffle of related paraphernalia, including but not limited to gaffs, tie cords, cages, training equipment, medications, and veterinary supplies.

E. For the purposes of this Indictment, the term "rooster" is synonymous with the terms "gamecock," "cock," "bird," and "chicken." A mature gamecock resembles an ordinary rooster, except it has been surgically altered, trained and conditioned for fighting. Gamecocks

also generally receive vitamins, drugs and other supplements to boost their strength and endurance.

F. Participants in the cockfighting described in this Indictment would bring roosters to a derby's designated location in Oregon, and other persons would come to the derby as spectators or workers. One or more of the participants and their roosters would have traveled in interstate commerce. Various persons would perform roles at the derby as described above, including but not limited to: collecting admission and entry fees and bets, weighing the roosters, matching the roosters for the fights, keeping written records of the fights, selling and sharpening gaffs, and disbursing the wagered money to the winners of the derby. One or more persons would manage and supervise the fights in the role of a referee. Persons would sell food and drinks at a concession stand.

### **OBJECTS OF THE CONSPIRACY**

Beginning on or about April 1, 2012, and continuing through about April 28, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, MAURO GONZALEZ PULIDO (aka Cala), RUBEN SALTOS GODINA (aka Chino), ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), EDUARDO CISNEROS (aka Mariachi), EULALIO DELAMORA ANGUIANO (aka Lalo), FRANCISCO JAVIER VEGA (aka Sergio Gonzalez Manzano), OSCAR ACOSTA NAVARRETE, ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), GERARDO GOMEZ CASTILLO (aka Aguilo), and VALENTE PIEDRA MAGANA, and others willfully and knowingly combined, conspired, confederated and agreed to commit the

following offense against the United States: to knowingly sponsor and exhibit an animal in an animal fighting venture in or affecting interstate or foreign commerce, in violation of Title 7, United States Code, Section 2156(a)(1).

### **OVERT ACTS**

In order to carry out the objects of the conspiracy, the above defendants and other persons committed various overt acts within the District of Oregon and elsewhere, including but not limited to the following:

1 On or about April 1, 2012, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), and ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.

2. On or about June 3, 2012, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), EULALIO DELAMORA ANGUIANO (aka Lalo), FRANCISCO JAVIER VEGA (aka Sergio Gonzalez Manzano), and ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and others, as principals and/or as



aiders and abettors, knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.

3. On or about November 22, 2012, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, RUBEN SALTOS GODINA (aka Chino), ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), EDUARDO CISNEROS (aka Mariachi), FRANCISCO JAVIER VEGA (aka Sergio Gonzalez Manzano), OSCAR ACOSTA NAVARRETE, ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and GERARDO GOMEZ CASTILLO (aka Aguilo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.

4. On or about December 16, 2012, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), FRANCISCO JAVIER VEGA (aka Sergio Gonzalez Manzano), OSCAR ACOSTA NAVARRETE, and ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.

5. On or about January 6, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, MAURO GONZALEZ PULIDO (aka Cala), RUBEN SALTOS GODINA (aka Chino), EULALIO DELAMORA ANGUIANO (aka Lalo), OSCAR ACOSTA NAVARRETE, and ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.

6. On or about January 27, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, RUBEN SALTOS GODINA (aka Chino), ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), and EULALIO DELAMORA ANGUIANO (aka Lalo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.

7. On or about February 17, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), and VALENTE PIEDRA MAGANA, and others, as principals and/or as aiders and abettors,

knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.

8. On or about March 10, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, APOLINAR MUNOZ GUTIERREZ (aka Polo), and CECILIO MENDOSA MAGANA, and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.

9. On or about April 28, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), and OSCAR ACOSTA NAVARRETE, and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.

10. On or about May 19, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, AURELIA GARCIA MENDOZA, RUBEN SALTOS GODINA (aka Chino), EULALIO DELAMORA ANGUIANO (aka Lalo), CECILIO MENDOSA MAGANA, APOLINAR MUNOZ GUTIERREZ (aka Polo) and VALENTE PIEDRA MAGANA, and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited one or more roosters in an animal fighting venture in or affecting interstate or foreign commerce.



All of the above conduct in Count 2 violated Title 18, United States Code, Section 371.

**COUNT 3**  
**(Unlawful Animal Fighting Venture)**

On or about April 1, 2012, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), and ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce; all in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**COUNT 4**  
**(Unlawful Animal Fighting Venture)**

On or about June 3, 2012, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), EULALIO DELAMORA ANGUIANO (aka Lalo), FRANCISCO JAVIER VEGA (aka Sergio Gonzalez Manzano), and ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce; all in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**COUNT 5**  
**(Unlawful Animal Fighting Venture)**

On or about November 22, 2012, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, RUBEN SALTOS GODINA (aka Chino), ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), EDUARDO CISNEROS (aka Mariachi), FRANCISCO JAVIER VEGA (aka Sergio Gonzalez Manzano), OSCAR ACOSTA NAVARRETE, ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and GERARDO GOMEZ CASTILLO (aka Aguilo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce; all in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**COUNT 6**  
**(Unlawful Animal Fighting Venture)**

On or about December 16, 2012, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), FRANCISCO JAVIER VEGA (aka Sergio Gonzalez Manzano), OSCAR ACOSTA NAVARRETE, and ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting

venture in or affecting interstate or foreign commerce; all in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**COUNT 7**  
**(Unlawful Animal Fighting Venture)**

On or about January 6, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, RUBEN SALTOS GODINA (aka Chino), EULALIO DELAMORA ANGUIANO (aka Lalo), OSCAR ACOSTA NAVARRETE, and ANTONIO DOMINGUEZ ROBLES (aka Tono, Memo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce; all in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**COUNT 8**  
**(Unlawful Animal Fighting Venture)**

On or about January 27, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, RUBEN SALTOS GODINA (aka Chino), ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), and EULALIO DELAMORA ANGUIANO (aka Lalo), and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce; all in

violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**COUNT 9**  
**(Unlawful Animal Fighting Venture)**

On or about February 17, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, AURELIA GARCIA MENDOZA, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), and VALENTE PIEDRA MAGANA, and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce; all in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**COUNT 10**  
**(Unlawful Animal Fighting Venture)**

On or about March 10, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, APOLINAR MUNOZ GUTIERREZ (aka Polo), and CECILIO MENDOSA MAGANA, and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce; all in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**COUNT 11**  
**(Unlawful Animal Fighting Venture)**

On or about April 28, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, JOSE LUIS VIRGEN RAMIREZ, APOLINAR MUNOZ GUTIERREZ (aka Polo), CECILIO MENDOSA MAGANA, ARTURO OLMEDO SILVA (aka El Havolin, Cepillo), and OSCAR ACOSTA NAVARRETE, and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce; all in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**COUNT 12**  
**(Unlawful Animal Fighting Venture)**

On or about May 19, 2013, at Irrigon, in Morrow County, in the District of Oregon, defendants JOHN WESLEY WALKER, IRINA WALKER (aka Irina Kreuger), MARIO PEREZ (aka El Cuba), DAVID SANCHEZ, AURELIA GARCIA MENDOZA, RUBEN SALTOS GODINA (aka Chino), EULALIO DELAMORA ANGUIANO (aka Lalo), CECILIO MENDOSA MAGANA, APOLINAR MUNOZ GUTIERREZ (aka Polo) and VALENTE PIEDRA MAGANA, and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce; all in violation of Title 7, United States Code, Section 2156(a)(1), and Title 18, United States Code, Section 2.

**FORFEITURE ALLEGATION**

Upon conviction of the offense alleged in Count 1 of this Indictment, defendants JOHN WESLEY WALKER and IRINA WALKER (aka Irina Kreuger), pursuant to Title 18, United



States Code, Section 1955(d), Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), shall forfeit to the United States any property used in violation of Title 18, United States Code, Section 1955 (Illegal Gambling Business), including but not limited to:

All lots or parcels of land together with their buildings, appurtenances, improvements, fixtures, attachments and easements located at 74826 and 74828 Depot Lane, Irrigon, Morrow County, Oregon, and any and all proceeds from the sale thereof, more particularly described as:

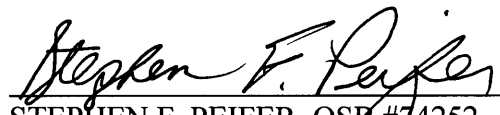
Parcel 04N2602-00200 and Parcel 04N2602-00201, said parcels  
being Parcels 1 and 2 respectively of Partition Plat 2008-11, signed  
on November 17, 2008, in Township 4N, Range 26 EWM2  
(formerly T4N26-700) W ½ NE ¼ N of Main Canal, Morrow  
County, Oregon.

Dated this 21<sup>st</sup> day of May 2013.

A TRUE BILL.

Presented by:

S. AMANDA MARSHALL  
United States Attorney

  
STEPHEN F. PEIFER, OSB #74252  
Assistant United States Attorney